## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

DENNIS BEIGHLE AND TINA BEIGHLE \$
Plaintiffs \$
CASE NO. 6:22-cv-00002

NARINDERJIT SINGH AND MASUTA \$
NATIONAL, INC., \$
Defendants \$

## NOTICE OF REMOVAL

## TO THE HONORABLE UNITED STATED DISTRICT JUDGE:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendant, MASUTA NATIONAL, INC., hereby removes this action to the United States District Court for the Western District of Texas from the 169<sup>th</sup> Judicial District Court of Bell County, Texas, stating as follows:

- 1. Plaintiffs, Dennis Beighle and Tina Beighle, commended this action in the 169<sup>th</sup> Judicial District Court of Bell County, Texas, where it was given Cause No. 21-DCV-327342. This action is between citizens of different states. Plaintiffs are residents of Texas. Defendant Narinderjit Singh is a resident of California; and Defendant Masuta National, Inc. is a California corporation. Further, Plaintiffs claim damages for personal injury and state in their Petition that they are seeking damages in the amount of over \$250,000 for the following:
  - a. Medical and pharmacy expenses in the past and future;
  - b. Physical pain and mental anguish in the past and future;
  - c. Past and future disfigurement:
  - d. Past and future physical impairment;

Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.

2. Defendant Masuta National, Inc. received the summons and complaint on December 8, 2021, so this removal is timely under 28 U.S.C. § 1446(b).

- A copy of all process, pleadings, and orders served upon Defendant is attached as ExhibitA.
- 4. Defendant has provided written notice of this Notice of Removal to all adverse parties and have filed a copy with the Clerk of the 169<sup>th</sup> Judicial District Court of Bell County, Texas.
- 5. Defendant Masuta National, Inc. consents to the removal.

Dated: January 3, 2022.

Respectfully submitted,

NAMAN, HOWELL, SMITH & LEE, PLLC 8310 Capital of Texas Highway North, Suite 490 Austin, Texas 78731

Austin, Texas 7873 (512) 479-0300

FAX (512) 474-1901

<u>aspy@namanhowell.com</u> jaltman@namanhowell.com

BY:

P. Clark Aspy
State Bar No. 01394170

Jacqueline Altman

State Bar No. 24087010

ATTORNEY FOR DEFENDANT, MASUTA NATIONAL, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded by the manner indicated below to all counsel of record on this 3<sup>rd</sup> day of January 2022.

Ty Gibson Brett Michael Hill Gibson Hill, PC 636 Hawthorne Street Houston, Texas 77006

P. Clark Aspy